

### **REMARKS**

Claims 1-3, 20, 22-24, and 28-33 have been cancelled. The claims remaining in the application are 4-19, 21, 25-27, 34, and 35.

#### **Drawings**

A copy of the formal drawings are submitted herewith with a copy of the Letter to the Official Draftsperson. Approval by the Examiner is respectfully requested.

#### **Rejection Under 35 U.S.C. § 103**

The Office Action has rejected claims 1-14, 18, 20, 24, 30, 31, and 33 under 35 U.S.C. 103(a) as being unpatentable over Zur (6,784,433) in view of Cato (5,874,724). This rejection is respectfully traversed.

The Office Action has rejected claims 15 and 16 under 35 U.S.C. 103(a) as being unpatentable over Zur (6,784,433) in view of Cato (5,874,724) and further in view of DaSilveira et al. (5,659,170). This rejection is respectfully traversed.

The Office Action has rejected claims 19 and 32 under 35 U.S.C. 103(a) as being unpatentable over Zur (6,784,433) in view of Cato (5,874,724) and further in view of Ouvrier-Buffer et al. This rejection is respectfully traversed.

The Office Action has rejected claim 21 under 35 U.S.C. 103(a) as being unpatentable over Jeromin et al. (6,075,248) in view of Cato (5,874,724) and further in view of Seppi (6,800,858). This rejection is respectfully traversed.

The Office Action has rejected claims 22, 23, 28, and 29 under 35 U.S.C. 103(a) as being unpatentable over Jeromin et al. (6,075,248) in view of Cato (5,874,724). This rejection is respectfully traversed.

A distinctive feature of this application is the independence of positioning, fabrication, and operation of each digital film grain from the others, yet their contributions in conjunction with an image accumulator constitutes an imaging system. There are no electrical conductors spanning the distance from one digital film grain to another nor to the base station. There is, however, a mechanical connection of each digital film grain to the others by virtue of attaching or immersing all of the digital film grains to the same polymeric

support, or by bonding together capillaries each containing a digital film grain. The base station assembles an image from separate film grains whose position in the image is not established as a consequence of the sensors' fabrication technique, such as lithography of a photodetector array.

The present application's digital film grain is differentiated from U.S. Patent No. 6,075,248 (Jeromin et al.) whose electrical conductors and radiation-sensitive material both span the distance between pixels. See Col. 4, Lines 44-45 of Jeromin et al. "A plurality of conductors 53 (only a portion of which is illustrated) extend between the sensors." The photosensitive layer is described as "continuous" in Col. 4, Lines 1-2 of Jeromin et al., and is depicted as continuous over all of the detective elements in its Figures 1, 2, 8, and 9.

Another patent by Jeromin (U.S. Patent No. 5,381,014) for fabricating a large detective array from smaller modules does not recognize the utility of single, separated detectors and a radiation-sensitive material for each detector. "Each of the discrete modules includes a plurality of thin-film transistors" demarcating pixels in Col. 3, Lines 10-13, meaning that even the smaller building blocks for the large detective array are themselves arrays, not individual detectors. This Jeromin patent also states that "a continuous radiation detecting layer is disposed over the plurality of juxtaposed modules," which is restated in claims 1 and 9. "Transistor-capacitor pixels...are electronically connected over lines 43 to a central control unit," see also, Col. 6, Lines 23-25 of U.S. Patent No. 5,381,014 (Jeromin). The utility of single, separated detectors and of a radiation-sensitive material for each detector remained unrecognized in the prior art until the present application.

The image accumulator of the present application is different than the image accumulator shown in U.S. Patent No. 6,800,858 (Seppi), in which the photo detectors "are arranged in a two-dimensional array." See Col. 5, Lines 25-26. Col. 5, Lines 35-37 of Seppi states that "The process of accessing photo detectors 42 and reading electric signals therefrom is known to those skilled in the art," indicating that Seppi's image accumulator can not assemble an image properly in the novel circumstance of sensors whose identities and positions are not preordained as an array during fabrication.

**Allowable Subject Matter**

The Office Action has allowed claims 25-27.

The Office Action has objected to claims 17, 34, and 35 but will allow them if they are rewritten in independent form including all of the limitations of the base claim and any intervening claims. These claims have been rewritten in independent form.

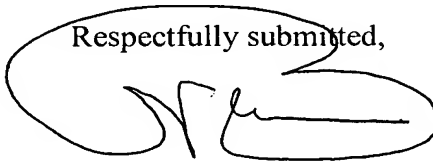
**CONCLUSION**

Dependent claims not specifically addressed add additional limitations to the independent claims, which have been distinguished from the prior art and are therefore also patentable.

In conclusion, none of the prior art cited by the Office Action discloses the limitations of the claims of the present invention, either individually or in combination. Therefore, it is believed that the claims are allowable.

If the Examiner is of the opinion that additional modifications to the claims are necessary to place the application in condition for allowance, she is invited to contact Applicant's attorney at the number listed below for a telephone interview and Examiner's amendment.

Respectfully submitted,



---

Attorney for Applicant(s)  
Registration No. 29,134

Nelson A. Blish/tmp  
Rochester, NY 14650  
Telephone: 585-588-2720  
Facsimile: 585-477-4646

If the Examiner is unable to reach the Applicant(s) Attorney at the telephone number provided, the Examiner is requested to communicate with Eastman Kodak Company Patent Operations at (585) 477-4656.

Encl: Copy of Letter to the Official Draftsperson  
Copy of Formal Drawings